

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

MAHMOUD KHALIL,

*Petitioner,*

v.

WILLIAM P. JOYCE, et al.,

*Respondents.*

Civil Action No. 25-cv-01963 (MEF) (MAH)

**DECLARATION OF  
ARTHUR J. WILSON, JR.**

I, Arthur J. Wilson, Jr., make the following statements under oath and subject to the penalty of perjury in accordance with the provisions of 28 U.S.C. 1746.

1. I am currently employed as the Deputy Field Office Director with U.S. Department of Homeland Security (“DHS”), U.S. Immigration and Customs Enforcement (“ICE”), Enforcement and Removal Operations (“ERO”), in Newark, New Jersey. In this position, I direct and maintain oversight of all immigration enforcement operations and activities in all 21 counties of the State of New Jersey. This includes oversight of detention operations at the Elizabeth Contract Detention Facility (“ECDF”), in Elizabeth, New Jersey.

2. I make this declaration based upon my professional and personal knowledge.

3. While ICE is still able to meet applicable detention standards, including the provision of adequate care to detainees, ECDF is currently over capacity. ERO is currently using ECDF to decompress other facilities in the area, while simultaneously attempting to decompress ECDF.

4. The bedspace capacity at ECDF is 304. At this time, ECDF is over capacity with occupancy at approximately 355, and looking to reduce the number of detainees to 304.

I declare under penalty of perjury that the foregoing is true and correct to the best of my information, knowledge, and belief and based upon records maintained in the ordinary course of

business.

Executed this 17<sup>th</sup> day of June 2025.

ARTHUR J WILSON JR  
Digitally signed by ARTHUR J  
WILSON JR  
Date: 2025.06.17 14:11:33 -04'00'

Arthur J. Wilson, Jr.  
Deputy Field Office Director  
U.S. Immigration and Customs Enforcement  
Newark, New Jersey